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GABRIEL GONZALES

7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,

Case No. 20-mj-70327 MAG [LB]

10 Plaintiff,

11 v.

12 GABRIEL GONZALES,

13 Defendant.

**GABRIEL GONZALES' *EX PARTE*
APPLICATION FOR ORDER
PERMITTING LIMITED
MODIFICATION TO HOME
CONFINEMENT; [Proposed] Order**

15 I, Ashley Riser, declare:

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17 1. I represent Defendant Gabriel Gonzales in the above-entitled matter. He is currently
18 released an unsecured \$75,000 bond with travel restricted to the Northern District of California
19 and home confinement. The purpose of this application is to request that Mr. Gonzales be allowed
20 to temporarily reside at his grandparents' house from February 19, 2021 to March 5, 2021. This
21 request is due to a family member's positive COVID test. The family member is at Mr. Gonzales'
22 residence.

23 2. AUSA Joseph Tartakovsky has no objection to this request.

24 3. Pretrial Services Officer Kalisi Kupu, who monitors Mr. Gonzales, informed me
25 that she does not object to this request in light of his continued compliance under supervision.

26 4. Defense counsel provided Officer Kupu with Mr. Gonzales' grandparents' address
27 and telephone number. Officer Kupu has also spoke with Mr. Gonzales' grandparents, who agreed
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1 to allow Mr. Gonzales to reside with them temporarily.

2 5. On January 11, 2021, the Court modified Mr. Gonzales' Pretrial Release conditions
3 to permit him to leave the residence to exercise for 20 minutes, three times per week. Dkt. 45.
4 However, in order to reduce Mr. Gonzales' potential exposure to the community, Mr. Gonzales
5 will not be permitted to go outside for twenty minutes three times a week. Once he returns to his
6 home, he will be allowed to resume this condition of his release.

7 6. Based on the above, I respectfully request that the conditions of Mr. Gonzales'
8 release be modified so that he may be permitted to allow to temporarily reside at his grandparents'
9 house from February 19 – March 5, 2021. All other conditions of Mr. Gonzales' release shall
10 remain the same. Furthermore, Mr. Gonzales shall inform his pretrial services officer of all travel-
11 related and residence details.

12 I declare under penalty of perjury under the laws of the United States that the foregoing is
13 true and correct.

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15 DATED: February 19, 2021

16 /s/
17 ASHLEY RISER
18 Attorney for GABRIEL GONZALES
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LAW OFFICES
JAYNE LAW GROUP, P.C.
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[PROPOSED] ORDER

Based on the foregoing, and good cause appearing:

IT IS HEREBY ORDERED that the conditions of Defendant Gabriel Gonzales' release shall be modified as follows:

Mr. Gonzales is permitted to reside with his grandparents for two weeks (February 19 – March 5, 2021) in order to avoid COVID exposure. During this period, he will not be permitted to go outside for twenty minutes three times per week. Once he returns to his residence, he will be permitted to do so.

All other terms and conditions shall remain in place.

DATED: _____

HONORABLE MAG. JUDGE LAUREL BEELER
United States Magistrate Court Judge